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February 28, 2025

**FILED VIA ECF**

Hon. Lewis A. Kaplan  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Tom Lenny De La Torre, 21 Cr. 466 (LAK)

Dear Judge Kaplan:

I represent Tom Lenny De La Torre. I write to request early termination of Mr. De La Torre's supervised release, which began in May 2023 and is currently scheduled to end in May 2026. Both the government and the Probation Department are in support of the instant request. Specifically, Probation Officer Kristina Tinajero has informed counsel that she is supportive of the instant request due to Mr. De La Torre's successful completion of treatment and remaining stable in the community.

On May 23, 2023, Mr. De La Torre was sentenced to time-served and three years' supervised release for violations of 21 U.S.C. Section 846, 18 U.S.C. Section 1956 and 8 U.S.C. 1324.

The statute governing early termination of supervised release, 18 U.S.C. § 3583(e), provides that the court may terminate a term of supervised release "and discharge the defendant released at any time after the expiration of one year of supervised release ... if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice." Here, we submit that Mr. De La Torre's behavior has been "exceptionally good" while on supervised release and that early termination is in the interest of justice. United States v. Lussier, 104 F.3d 32, 36 (2d Cir. 1997).

Since his release from prison, Mr. De La Torre has maintained full-time employment. Specifically, Mr. De La Torre returned to his job at Star Tech Mercedes-Benz in Denver, Colorado. And, as noted above, he has also successfully completed an outpatient drug treatment program.

We also note that Mr. De La Torre's mother and son have recently moved to California, and he hopes to join them there soon. Mr. De La Torre had been caring for his 75-year-old mother, but she recently fell and requires extra care and attention, which she can get in California where additional family lives. Mr. De La Torre, who is a certified Mercedes-Benz technician, has several interviews lined up and once he secures employment, he hopes to join his family in California.

For all of the above reasons, and with the support of Probation, we respectfully ask that the Court terminate Mr. De La Torre's supervised release.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)  
Probation Officer Kristina Tinajero (via e-mail)

Granted  
Lewis Kaplan  
SO ORDERED  
3/3/25  
LEWIS A. KAPLAN, USBJ